

July 8, 2004

TO: Paul Dabbs
FR: Betsy Reifsnider
RE: Comments on Volume I, Bulletin 160:03

On behalf of Friends of the River, California's statewide river conservation organization, I am pleased to provide these comments on *Volume I: Strategic Plan* of the draft Bulletin 160:03.

Nick DiCroce has already submitted comments for the Environmental Caucus. As a member of the Caucus, Friends of the River is in complete agreement with those comments. For brevity's sake, we will not reiterate the points Nick has already made.

Friends of the River would like to offer these additional comments:

- All the draft volumes we have reviewed are filled with comprehensive and *comprehensible* information that will be useful, not only to water planners and public decision-makers, but to the general public as well. DWR staff is to be commended for making this a transparent, welcoming, and conscientious process.
- In Chapter 1, page 5 we are pleased that DWR uses the term "realistic" to describe funding strategies. In the "overarching principle for State funding ... to invest in activities that proceeds to meet statewide water management objectives," we strongly urge DWR to state it will undertake only those activities that are "least cost, environmentally- and socially-responsible, and require beneficiaries to pay."
- On page 10 of Chapter 1, we can support the Mission Statement but disagree that we need to "revitalize" California business and agricultural industry. We recommend you change the sentence to read: "(2) strengthen economic growth, business and industry..." In this way, all the state's industries – recreation, tourism, manufacturing, and agriculture – will be included.
- In the table on page 5, Chapter 2, we note that Bulletin 160:03 uses the misleading information that "environmental water "uses between 35% and 64% of dedicated water supply and is the largest applied water user in the state. As Friends of the River explained in our Bulletin 160:98 comments, those instream flows and wild and scenic flows represent water that is used *over and over* again by agricultural and water users. We believe the figure on page 5 represents double-counting and gives the false impression that the environment is the biggest water user in the state -- to the detriment of more *junior* water rights holders, such as cities and farms.
- In the last paragraph on page 5, you mention the year 20001 as a dry year. We think you mean 2001.
- On page 11, we urge you to add the following information to the description of the Sacramento River Hydrologic Region: The Sacramento River and its watershed remain the last best refuge for the fish and wildlife that depend on

Central Valley river ecosystems. Despite the huge Shasta dam, the Sacramento River is one of the least modified major waterways in the state, supporting all four seasonal runs of chinook salmon. It provides spawning grounds for a host of other endangered and threatened native fish. Various agencies and water developers propose to suck up to 2 million acre feet of additional water out of the Sacramento Valley in the coming years. Proposed projects include increased Delta pumping, more reservoirs, more water transfers, and increased groundwater pumping.

- On page 12, in describing the San Joaquin River Hydrologic Region, DWR seems to emphasize the adverse impacts to Friant Water Users. We recommend adding the following information: Unlike other major dams in the state, Friant releases no water for the environment, causing parts of the river to completely dry up. In addition to destroying historic chinook salmon runs, Friant Dam cuts off flows and causes harm downstream. This harm is aggravated by the export of water from the Delta to the west side of the San Joaquin Valley and the return of polluted drainage water back into the river, adversely affecting downstream agriculture.
- On page 12, Chapter 2, we recommend including findings from the Rainbow Report to characterize the seriousness of the Tulare Lake drainage problems.
- On page 15, in the description of the Mountain Counties, we recommend including the findings of the Congressionally mandated 1996 Sierra Nevada Ecosystem Project.
- On page 27, Chapter 2, we recommend giving the last paragraph on the page much more prominence. In fact, this statement on the constitutional, statutory, and common law framework for water uses should be the Vision and Mission Statement for the California Water Plan. “The people of California own all the water in the State... It places a significant limitation on water rights by prohibiting the waste, unreasonable use, unreasonable method of use, or unreasonable method of diversion of water.”
- In Box xx on an unnumbered page, there is a list of Examples of Ongoing Regional Water Planning. You refer to an “American River Forum,” but we believe you mean the “Sacramento Water Forum.”
- Chapter 5, page 2. We support water conservation and efficient water management as the first Recommended Action in the Action Plan. We understand that the phrase “increase water storage to improve flexibility...” can refer to better groundwater management, re-operation of facilities, and conjunctive use.
- On page 2, the last bullet in the Action Plan, we recommend that adding the phrase “that are least-cost, and environmentally- and socially-responsible” to the sentence that begins “The State should provide public funding...”
- On page 3, in Performance Measures, we recommend adding “the amount of water saved through urban and agricultural Best Management Practices implementation” and “the percent of total budget that state and local water agencies dedicate in personnel and resources to water efficiency programs.”
- On page 5, in Performance Measures, we recommend that the Agricultural Water Management Council develop performance measures that are at least as

- quantifiable and objective as those of the California Urban Water Conservation Council.
- On page 8, we agree with Recommended Action #4 on the need to develop broad and realistic funding strategies. We reiterate the comments already submitted by the Environmental Caucus that pricing structures, marginal cost of supply, and other pricing signals must receive much greater prominence in Bulletin 160:03. At present, the subject of Pricing and Economics is almost non-existent.
 - On page 16, we are concerned with investment in the “commercialization” of water technologies and would like to see this concept more fully explained. For instance, we are concerned that taxpayer-funded research and academic institutions would develop the new water technologies but all the financial benefit would accrue to private corporations and entrepreneurs.
 - On pages 16, 17, we are concerned that Global Climate Change is relegated to a few bullet points on “intended outcomes” and performance measures. This issue must receive much greater prominence in the California Water Plan. For instance, another state agency, the California Energy Commission, is taking a pro-active approach through its Climate Change Program and development of a Climate Action Registry.

Thank you for the opportunity to comment. Friends of the River deeply appreciates the hard work, experience, expertise and dedication of the DWR staff.